

ADDENDUM

Legend For Comment/Responses **To** **CSAC 15 Day Notice of Proposed Modifications to MMA Regulation**

W-1 = This comment was rejected because it did not address the proposed changes in the 15-day notice. No revision needed.

W-2 = This comment was rejected at this time because the commission believed the health and safety issues require further study, and also due to the need to complete the rulemaking process before the one-year notice period expired and the uncertainty whether State and Consumer Services Agency would act on the file within that time period. The commission expects to re-visit these issues at a later time. No revision needed.

UPDATED INFORMATION

The Commission posted a 15-day Notice of Availability of Modified Text and the proposed text modifications to sections 512, 513, and 523 on August 11, 2005 with a final date for comments set at August 26, 2005. The Modified Text was heard at a special commission meeting on August 29, 2005. The original MMA regulatory proposal was the subject of a regulatory hearing on February 27, 2005.

The Commission received comments on the Proposed Modified Text from Mr. Turi Altavilla, Mr. Kirk Hendrick, Mr. McCarthy, Mr. Robert Philiposian, Mr. Robarte, Mr. Dennis Warner, Mr. Mike Rush and Mr. Stephen Quadros.

FSOR
ADDENDUM OBJECTIONS/RECOMMENDATIONS/RESPONSES

COMMENT NUMBER	SECTION AREA	COMMENTATOR/COMMENTS BOTH ORAL (O) & WRITTEN (W)	RESPONSE	REVISION NEEDED
W-1	Initial Statement of Reasons	<u>GREG "KAZJA" PATSHULL (Written & Oral)</u> He asked the Commission to delete from the Initial Statement of Reasons the reference to this sport being a "blood sport" and expressed his view that grappling is not full contact and therefore is not within the Commission's jurisdiction.	Rejected: This comment was rejected because it did not address the proposed changes in the 15-day notice.	No revision needed.
W-2	<u>512-Rounds; Number; Length; Rest Period</u>	<u>KIRK HENDRICK, CHIEF OPERATING OFFICER FOR ULTIMATE FIGHTING CHAMPIONSHIP (Written/Oral)</u> 1)Article 2, Section 512 (b) The 10-5-5 round format violates the 10-point must system for scoring.	Rejected: This comment was rejected at this time because the round format was not inconsistent with the 10-point must system.	No revision needed.
W-3	<u>512-Rounds; Number; Length; Rest Period</u>	<u>MR. MCCARTHY, PROFESSIONAL MMA REFEREE FOR ULTIMATE FIGHTING CHAMPIONSHIP (Oral)</u> 1)Article 2, Section 512 (b) Indicated that he was opposed to the 10-5-5 round format.	Rejected: This comment was rejected because it did not address the proposed changes in the 15-day notice.	Same as W-2.
W-4	<u>512-Rounds; Number; Length; Rest Period</u>	<u>TURI ALTAVILLA-PRIDE (Written/Oral)</u> 1)Article 2, Section 512 Turi Altavilla, representing Pride, stated that there are alternate versions of sports you see every day—for example, variations between the National and American Leagues in baseball, and between pro and college football. He described the requested changes as minor modifications. He stated that there have been no deaths or serious injuries and that these modifications are not safety issues. In answer to Commissioner Keller's question whether there is any connection between uniformity of rules	Rejected: Same as W-2.	Same as W-2.

ADDENDUM OBJECTIONS/RECOMMENDATIONS/RESPONSES

COMMENT NUMBER	SECTION AREA	COMMENTATOR/COMMENTS BOTH ORAL (O) & WRITTEN (W)	RESPONSE	REVISION NEEDED
		<p>and fighter safety, Mr. Altavilla stated that these are not safety issues and uniformity is not needed. The organization that he represents has been promoting in Japan since 1997 and he offered the help of its referees.</p> <p>The 10-5-5 round format is fair to all disciplines as shorter round lengths benefit strikers (who are used to shorter rounds) and the nature of grappling involves a longer amount of time to set up moves. A 10 minute first round insures that fighters are in top condition, which makes for better fights.</p> <p>The 10-5-5 round format was originally adopted in response to "no time limit" bouts being held by other MMA organizations. There have been no reported injuries due to implementation of the 10-5-5 round format</p> <p>.. . It's such a mixed sport that there are some fighters that are very grappling based. Their whole game is to get a fighter down to the ground and uh grappling is a chess match. It takes them longer to set things up on the ground than it does for striking. Not that striking can't be very technical and complex in setting things up but in Jiu-Jitsu and submission wrestling sometimes you have to think four or five moves ahead. And sometimes it takes them a long time to get to that point. So that's why we feel a ten-minute opening round is more fair to a grappler while not being unfair to the striker.</p>		
W-5	<u>512-Rounds; Number; Length; Rest Period</u>	<p><u>DENNIS WARNER-MARTIAL ARTS PROMOTER (Oral)</u></p> <p>1)Article 2, Section 512</p> <p>Dennis Warner stated that the Commission should vote for the changes as there are no health and safety issues.</p> <p>As far as the safety issue with the 10-5-5 look at boxing. Boxing has a ten round fight three minutes each. That's thirty minutes of fighting that you can knock somebody out. 10-5-5 that's 20 minutes of</p>	Rejected: Same as W-2.	Same as W-2.

ADDENDUM OBJECTIONS/RECOMMENDATIONS/RESPONSES

COMMENT NUMBER	SECTION AREA	COMMENTATOR/COMMENTS BOTH ORAL (O) & WRITTEN (W)	RESPONSE	REVISION NEEDED
		fighting. I don't see how you can say that a 10-5-5 is anymore dangerous than boxing.		
W-6	<u>513-Fighters' Equipment</u>	<p><u>KIRK HENDRICK, CHIEF OPERATING OFFICER FOR ULTIMATE FIGHTING CHAMPIONSHIP (Written/Oral)</u></p> <p>2) Article 2, Section 513 (a)</p> <p>Since a gi can be used as a tool, permitting a gi to be worn runs counter to the concept of unarmed combat.</p> <p>It is undeniable that a GI can be used as a tool to choke out an opponent. If someone can use a tool to choke out somebody else, an article of clothing to yank across their neck. That's counter-intuitive, counterproductive to the idea of unarmed combat. You shouldn't be allowed to have a weapon or a tool to use.</p>	Rejected: Same as W-2.	Same as W-2.
W-7	<u>513-Fighters' Equipment</u>	<p><u>MR. MCCARTHY, PROFESSIONAL MMA REFEREE FOR ULTIMATE FIGHTING CHAMPIONSHIP (Oral)</u></p> <p>2) Article 2, Section 513 (a)</p> <p>Indicated that he was opposed to the wearing of a gi.</p> <p>..., it is not only used to choke people. That is only one of the ways it is used. But it's used to control people. That is what you do. I've been a Jiu-Jitsu competitor, I've done a lot of things and I do not like wearing GI's because a GI allows someone to control my body parts or negate what I have actually in my strength factors because a GI is a tool. When you talk about using a GI in a fight it's basically used to control art to control him just by the friction created by that tool. The GI controls people because it absorbs sweat. Sweat on competitors actually makes it so when a submission is put on at times a fighter can pull out of it.</p>	Rejected: Same as W-2.	Same as W-2.
		<u>KIRK HENDRICK, CHIEF OPERATING OFFICER</u>		

ADDENDUM OBJECTIONS/RECOMMENDATIONS/RESPONSES

COMMENT NUMBER	SECTION AREA	COMMENTATOR/COMMENTS BOTH ORAL (O) & WRITTEN (W)	RESPONSE	REVISION NEEDED
W-8	<u>513-Fighters' Equipment</u>	<p><u>FOR ULTIMATE FIGHTING CHAMPIONSHIP (Written/Oral)</u></p> <p>2) Article 2, Section 513 (b)</p> <p>Shoes can result in more constant, consistent kicking to opponents. They were allowed when the sport first started but later were not permitted. Regarding shoes. Common sense dictates that a person can kick something a lot harder and for a lot longer period of time if he has a shoe on his foot. As a result the shoes can be used to cause more constant sustained kicking of an opponent. I have a tape here to show you some clips of examples of the use of rings, GI's and shoes. Shoes were allowed when the sport first started but later were not permitted.</p>	Rejected: Same as W-2.	Same as W-2.
W-9	<u>513-Fighters' Equipment</u>	<p><u>TURI ALTAVILLA-PRIDE (Oral)</u></p> <p>2) Article 2, Section 513 (a)</p> <p>Turi Altavilla, representing Pride, stated that there are alternate versions of sports you see every day—for example, variations between the National and American Leagues in baseball, and between pro and college football. He described the requested changes as minor modifications. He stated that there have been no deaths or serious injuries and that these modifications are not safety issues. In answer to Commissioner Keller's question whether there is any connection between uniformity of rules and fighter safety, Mr. Altavilla stated that these are not safety issues and uniformity is not needed. The organization that he represents has been promoting in Japan since 1997 and he offered the help of its referees.</p> <p>MMA = "Mixed Martial Arts," as such, equipment varies among martial art disciplines. Following the spirit of MMA, participants should be given the option of wearing attire relevant to their discipline (i.e. wrestling shoes or a gi, both of which have been endorsed in Olympic competition). As the</p>	Rejected: Same as W-2.	Same as W-2.

ADDENDUM OBJECTIONS/RECOMMENDATIONS/RESPONSES

COMMENT NUMBER	SECTION AREA	COMMENTATOR/COMMENTS BOTH ORAL (O) & WRITTEN (W)	RESPONSE	REVISION NEEDED
		<p>glove protects both the hand and the person being struck, the shoe protects the foot and the person being kicked. In essence, the shoe functions as a glove for the foot.. The shoe protects the person being kicked from the full impact of the bone as well as being scratched by toe nails or calloused feet.. All equipment will be subject to the official's inspection. The choice of using either shoes or a gi is a matter of fighting style not safety. There have been no reported injuries due to usage of the gi or wrestling shoes</p> <p>Shoes</p> <p>Shoes have been a part of the PRIDE Fighting championships throughout the event's history. More particularly, wrestling shoes; the same type used in amateur wrestling competitions as well as the Olympics. Typically, these shoes are made of a soft upper cloth consisting of any combination of nylon, polyester, or leather. Laces are made of cloth and the shoes extend up the ankle. The sole is made of a thin, flexible rubber, commonly between 1/4" and 1/2". Shoes with Velcro or metal parts are prohibited and all shoes are subject to official's inspection. There have been no reported injuries due to usage of wrestling shoes</p> <p>.. . Before the shoe felt, they had tape applied to the foot. They protect the foot, but they also can protect the person being kicked. As far as calluses on the foot, toenails, things of that nature that can start cuts. Let's be honest nobody really wants to get kicked but the shoe is an option it's not a safety issue that's going to hurt anybody. Anymore than as far as the nature of a kick.</p> <p>Equipment</p> <p>Traditional fighting attire includes boxing/Muay Thai shorts (as shown by PRIDE fighter Alistair Overeem</p>		

ADDENDUM OBJECTIONS/RECOMMENDATIONS/RESPONSES

COMMENT NUMBER	SECTION AREA	COMMENTATOR/COMMENTS BOTH ORAL (O) & WRITTEN (W)	RESPONSE	REVISION NEEDED
		<p>on the left), as well as spandex shorts (as shown by PRIDE fighter Kevin Randleman on the right). Both are allowed under the proposed rules.</p> <p>The Gi</p> <p>The above photo shows Olympic Gold Medallist Hidehiko Yoshida in his traditional Judo gi. Typically, the gi is made of cotton. The gi is used in numerous Olympic competitions such as Judo and Tae Kwon Do . Yoshida prefers to represent his art by wearing the gi during his mixed martial arts matches. As shown in this photo he also prefers fighting barefoot, which is an option given to all fighters---fighting barefoot or in wrestling shoes. There have been no reported injuries due to usage of the gi</p> <p>Again we have an option. It's not a safety issue of someone being choked by a GI. The type of choke is similar to a choke you can already get with your bare hands or forearms. Such as a rear necked choke. A chokes a choke.</p> <p>.. . And the GI is also not necessarily an advantage to the person wearing it. It could be a disadvantage. But it's not a safety issue it's an option. And as the modified text states, the opponents will be notified at the weigh-in whether or not his opponent will be wearing a GI.</p> <p>Wrestling Shoes and the Gi</p> <p>Hidehiko Yoshida (left) in judo gi versus Rulon Gardner (right) in wrestling shoes.</p> <p>Note that Yoshida's black belt and Gardner's shoes are taped for safety.</p>		
		<u>DENNIS WARNER-MARTIAL ARTS PROMOTER</u>		

ADDENDUM OBJECTIONS/RECOMMENDATIONS/RESPONSES

COMMENT NUMBER	SECTION AREA	COMMENTATOR/COMMENTS BOTH ORAL (O) & WRITTEN (W)	RESPONSE	REVISION NEEDED
W-10	<u>513-Fighters' Equipment</u>	<p><u>(Oral)</u></p> <p>2) Article 2, Section 513 (a)</p> <p>Dennis Warner stated that the Commission should vote for the changes as there are no health and safety issues.</p> <p>As far as martial arts, this is mixed martial arts this is under martial arts legislation. To deny a martial artist the right to wear a traditional "GI" is unbelievable. That you are actually sitting here saying we are going to do martial arts but you cannot wear a "GI". Traditional martial artists. Some are the finest in the world, will not fight, will not compete without the use of a "GI". So I want you to at least consider that.</p>	Rejected: Same as W-2.	Same as W-2.
W-11	<u>523-Ring</u>	<p><u>KIRK HENDRICK, CHIEF OPERATING OFFICER FOR ULTIMATE FIGHTING CHAMPIONSHIP (Written/Oral)</u></p> <p><u>5) Article 4, Section 523, Sub-section (b) (c) & (d)</u></p> <p>... People fall out of the ring when it is used for MMA and a fighter recently fell out of the ring at a Pride event.</p>	Rejected: Same as W-2.	Same as W-2.
W-12	<u>523-Ring</u>	<p><u>MR. MCCARTHY, PROFESSIONAL MMA REFEREE FOR ULTIMATE FIGHTING CHAMPIONSHIP (Oral)</u></p> <p><u>5) Article 4, Section 523, Sub-sections (b) (c) & (d)</u></p> <p>Indicated that he was opposed to the use of a ring.</p>	Rejected: Same as W-2	Same as W-2.
W-13	<u>523-Ring</u>	<p><u>TURI ALTAVILLA-PRIDE (Oral)</u></p> <p><u>5) Article 4, Section 523, Sub-section s (b) (c) & (d)</u></p> <p>Turi Altavilla, representing Pride, stated that there are alternate versions of sports you see every day—for example, variations between the National and American Leagues in baseball, and between pro and college football. He described the requested</p>	Rejected: Same as W-2.	Same as W-2.

ADDENDUM OBJECTIONS/RECOMMENDATIONS/RESPONSES

COMMENT NUMBER	SECTION AREA	COMMENTATOR/COMMENTS BOTH ORAL (O) & WRITTEN (W)	RESPONSE	REVISION NEEDED
		<p>changes as minor modifications. He stated that there have been no deaths or serious injuries and that these modifications are not safety issues. In answer to Commissioner Keller's question whether there is any connection between uniformity of rules and fighter safety, Mr. Altavilla stated that these are not safety issues and uniformity is not needed. The organization that he represents has been promoting in Japan since 1997 and he offered the help of its referees.</p> <p>The ring (ropes), minus the fenced enclosure, is an already accepted arena for hand to hand competition (such as for boxing and kickboxing)</p> <ul style="list-style-type: none"> . Safe for participants . Less obtrusive to spectators . The ring (ropes) cannot be "used as a weapon" by fighters, unlike a cage . Ring (ropes) usage for MMA bouts has already been approved by the Nevada and New Jersey State Athletic Commissions . There have been no reported injuries due to using a ring enclosed by ropes <p>The PRIDE Ring (ropes)</p> <p>The PRIDE ring, enclosed by ropes, has been safely used in competition since 1997, encompassing nearly 50 events and 450 bouts. The ring measures 23 feet by 23 feet and contains 5 ropes. A low bottom rope insures that participants will not fall out of the ring. Additional safety precautions include a two foot lip around the ring (the ring apron), vertical ropes which keep the horizontal ropes together, and two sub-referees who rove around in the event that participants happen to come close to the edge of the ring. In PRIDE's history, no participants have fallen out of the ring.</p> <p>The Ring in Mixed Martial Arts</p> <p>The use of the ring (enclosed by ropes) has already been approved by the New Jersey State Athletic Commission as shown in the photo above, which</p>		

ADDENDUM OBJECTIONS/RECOMMENDATIONS/RESPONSES

COMMENT NUMBER	SECTION AREA	COMMENTATOR/COMMENTS BOTH ORAL (O) & WRITTEN (W)	RESPONSE	REVISION NEEDED
		<p>took place at an event called "Euphoria" at the Trump Taj Majal in New Jersey.</p> <p>Comparative Injury Information Since 1997, PRIDE Fighting/Dream Stage Entertainment has promoted over 450 Matches under the optional rules contained in the modified text and no Deaths or serious injuries have occurred.</p> <p>Boxing Since 1993, 96 people have died during boxing matches or in training. Eight of these were just from sparring.</p> <p>Football With its repeated collisions, fatalities due to head and neck injuries as well as heat stroke are commonplace in American football, from high school To the professional levels.</p> <p>Mixed Martial Arts (MMA) Based on our knowledge of the international mixed martial arts scene, there have been no reported deaths in any sanctioned event. We are aware of two deaths that have occurred in underground events: In 1994, 1 person died in a Russian underground event. (Cage Fight) In 2005, 1 person died in a Korean underground event. (Cage Fight)</p>		
W-14	<u>523-Ring</u>	<p><u>ROBERT PHILIBOSIAN-PRIDE (Oral)</u></p> <p><u>5) Article 4, Section 523, Sub-section s (b) (c) & (d)</u></p> <p>Mr. Robert Philibosian, representing Pride, stated that the ring is more beneficial to spectators because they can see the fight much better.</p>	Rejected: Same as W-2.	Same as W-2.
		<u>MR. ROBARTE-PRIDE (Oral)</u>		

FSOR

ADDENDUM OBJECTIONS/RECOMMENDATIONS/RESPONSES

COMMENT NUMBER	SECTION AREA	COMMENTATOR/COMMENTS BOTH ORAL (O) & WRITTEN (W)	RESPONSE	REVISION NEEDED
W-14	<u>523-Ring</u>	<p><u>5) Article 4, Section 523, Sub-section s (b) (c) & (d)</u></p> <p>One quick thing on the ropes which is in your material and it bares repeating, and that is one of the reasons for the use of the ropes is that as far as the visual for the spectators is concerned. It's much more beneficial for the spectators. That's one of the reasons we had for the ropes.</p>	Rejected: Same as W-2.	Same as W-2.
W-15	<u>523-Ring</u>	<p><u>DENNIS WARNER-MARTIAL ARTS PROMOTER (Oral)</u></p> <p><u>5) Article 4, Section 523, Sub-section s (b) (c) & (d)</u></p> <p>Dennis Warner stated that the Commission should vote for the changes as there are no health and safety issues.</p> <p>I have been a promoter in the state of California for ten years. In the last meeting you had three promoters martial arts/boxing talking about doing mixed shows with a ring. If you pass the legislation as it is you're denying that. We've been in this state doing shows. These two gentlemen of the Pride Organizations have not done one show in this state. You would be denying some big boxing promoters from doing this type of show.</p>	Rejected: Same as W-2.	Same as W-2.
W-16	<u>523-Ring</u>	<p><u>MR. MIKE RUSH-OWNER OF UNITED MIXED MARTIAL ARTS (Oral)</u></p> <p><u>5) Article 4, Section 523, Sub-section s (b) (c) & (d)</u></p> <p>..., I think having these events in a ring is safer than a cage. In a ring you cannot get pinned against a chain link fence, and with a ring, it enables a fighter to highlight his skills like jujitsu.</p> <p>... It is against the rules to eject or throw your opponent out of the ring or cage. I have had several professional fighters come to train at our gym, Ken Shamrock, Guy Metzger, Josh Barnett, Vernon White, and Erik Paulsson. We have a ring, not a cage and I have never seen an injury because of the ring.</p>	Rejected: Same as W-5.	Same as W-5.

ADDENDUM OBJECTIONS/RECOMMENDATIONS/RESPONSES

COMMENT NUMBER	SECTION AREA	COMMENTATOR/COMMENTS BOTH ORAL (O) & WRITTEN (W)	RESPONSE	REVISION NEEDED
		... I feel the promoter should have his choice of a ring or a cage. With a ring, it is easier to view, plus you can host kickboxing, boxing, and Mixed Martial Arts. With a cage, you are limited to just Mixed Martial Arts.		